

**GIBBONS P.C.**

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and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

NEW ENGLAND MOTOR FREIGHT, INC.,  
*et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-12809 (JKS)

(Jointly Administered)

Objection Deadline: November 28, 2019, 4:00pm ET  
Hearing Date: December 5, 2019, 10:00am ET  
Re: Docket Nos. 943; 960; 961

**NOTICE OF SECOND INTERIM FEE APPLICATIONS**

**TO: (I) THE DEBTORS; (II) OFFICE OF THE UNITED STATES TRUSTEE FOR REGION THREE; (III) COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; (IV) COUNSEL TO ALL SECURED CREDITORS; AND (V) ALL PARTIES WHO HAVE FORMALLY REQUESTED NOTICES IN THIS CASE PURSUANT TO FED. R. BANK. P. 2002.**

**PLEASE TAKE NOTICE** that the following interim fee applications ("Interim Fee Applications") have been filed with the United States Bankruptcy Court for the District of New Jersey in the above-captioned Chapter 11 cases:

- *Second Interim Fee Application of Donlin Recano & Company, Inc. for Compensation for Services Rendered and Reimbursement of Expenses as Administrative Advisor to the Debtors for the Period June 1, 2019 through September 30, 2019 [ECF No. 705, filed October 28, 2019];*

<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

- *Second Interim Fee Application for Allowance of Fees and Reimbursement of Expenses to WithumSmith + Brown as Accountants to the Debtors for the Period June 1, 2019 through September 30, 2019 [ECF No. 960, filed November 1, 2019];*
- *Second Interim Fee Application of Gibbons P.C. for Compensation for Services Rendered and Reimbursement of Expenses as Counsel for Debtors for the Interim Period June 1, 2019 through September 30, 2019 [ECF No. 961, filed November 1, 2019].*

**PLEASE TAKE FURTHER NOTICE** that objections to any of the Interim Fee Applications must be filed with the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102 on or before **November 28, 2019 at 4:00 p.m.** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that court appearances will be required to prosecute any such objections. Any objections or responses to any of the Interim Fee Applications should also be served so as to be received by the following on or before the Objection Deadline:

- (i) *Counsel for Debtors:* Gibbons P.C., One Gateway Center, Newark, NJ 07102-5310, Attn: Karen A. Giannelli, Esq., Mark B. Conlan, Esq., Brett S. Theisen, Email: kgiannelli@gibbonslaw.com, mconlan@gibbonslaw.com, btheisen@gibbonslaw.com;
- (ii) *U.S. Trustee:* Office of the United States Trustee, One Newark Center, 1085 Raymond Blvd., Suite 2100, Newark, NJ, Attn: Mitchell B. Hausman and Peter J. D’Auria, Email: Mitchell.B.Hausman@usdoj.gov, Peter.J.D’Auria@usdoj.gov;
- (iii) *Counsel for the Official Committee of Unsecured Creditors:* Lowenstein Sandler LLP, One Lowenstein Drive, Roseland, NJ 07068, Attn: Joseph J. DiPasquale and Mary E. Seymour, Email: jdipasquale@lowenstein.com, mseymour@lowenstein.com and Elliott Greenleaf, 1105 N Market St, 17th Fl, Wilmington, DE 19801-1216, Attn: Rafael X. Zahralddin and Jonathan M. Stemerman, Email: rxza@elliottgreenleaf.com, jms@elliottgreenleaf.com.

**PLEASE TAKE FURTHER NOTICE** that if any objections are filed to any of the Interim Fee Applications, a hearing will be held on such Interim Fee Application(s) on **December 5, 2019 at 10:00 a.m. E.T.** before the Honorable John K. Sherwood, United States Bankruptcy Judge, in Courtroom 3D at the United States Bankruptcy Court for the District of New Jersey, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, NJ 07102.

**PLEASE TAKE FURTHER NOTICE THAT TO THE EXTENT OBJECTIONS TO ANY INTERIM FEE APPLICATION ARE NOT TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN ANY SUCH INTERIM FEE APPLICATION(S) WITHOUT FURTHER NOTICE OR HEARING.**

Date: November 5, 2019  
Newark, New Jersey

**GIBBONS P.C.**

By: /s/ Karen A. Giannelli

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